

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor in interest by merger to National City Bank, successor in interest by merger to Mid America Bank, FSB

Plaintiff,

v.

Jose S. Perez; Katherine Perez,

Defendants.

Case No. 13 cv 8521

Assigned Judge: Robert W. Gettleman

Magistrate Judge: Geraldine Soat Brown

Property Address: 1300-1310 W. 57th St.

Chicago, IL 60636

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, successor in interest by merger to National City Bank, successor in interest by merger to Mid America Bank, FSB, by its attorneys Crowley & Lamb, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

1. Jose S. Perez; and
2. Katherine Perez

and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of this Motion attached hereto as Exhibit "A", and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor in interest by merger to National City Bank, successor in interest by merger to Mid America Bank, FSB

By: /s/ Jennifer E. Frick
One of Its Attorneys

James M. Crowley(ARDC #6182597)
Jennifer E. Frick (ARDC#6299794)
CROWLEY & LAMB, P.C.
221 N. LaSalle Street, Suite 1550
Chicago, Illinois 60601
(312) 670-6900
jcrowley@crowleylamb.com
jfrick@crowleylamb.com